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Proposed attorneys for John P. Pringle,
Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

SIR TAJ LLC,

Debtor and Debtor in Possession

Case No.: 2:24-bk-10874-VZ

Chapter 11 Case

**NOTICE OF FILING OF
APPLICATION OF CHAPTER 11
TRUSTEE TO EMPLOY LEVENE,
NEALE, BENDER, YOO, AND
GOLUBCHIK L.L.P. AS GENERAL
BANKRUPTCY COUNSEL**

[No Hearing Required]

TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that John P. Pringle, the Chapter 11 trustee (the “Trustee” or “Applicant”) for the estate of Sir Taj LLC (the “Debtor”), has filed an application (the “Application”) to employ the law firm of Levene, Neale, Bender, Yoo & Golubchik L.L.P. (“LNBYG”) as general bankruptcy counsel pursuant to 11 U.S.C. § 327, with compensation pursuant to 11 U.S.C. § 330, and effective as of April 3, 2024. A copy of the complete Application

1 is on file with the Court and may be obtained by submitting a written request to LNBYG, whose
2 name, address and facsimile number are set forth in the upper left-hand corner of the first page
3 of this Notice.

4 **PLEASE TAKE FURTHER NOTICE** as a trustee in a chapter 11 bankruptcy case,
5 Applicant requires experienced bankruptcy counsel to, among other things, represent Applicant
6 in all bankruptcy related matters, assist Applicant to satisfy the requirements under the
7 Bankruptcy Code, the Bankruptcy Rules, and the Guidelines of the United States Trustee (“UST”) for
8 maintaining and proceeding with this chapter 11 bankruptcy case, assist Applicant to, among
9 other things, sell assets, obtain use of cash collateral, propose and confirm a chapter 11 plan of
10 reorganization if and when appropriate, and assist Applicant in all other facets of this chapter 11
11 bankruptcy case. Applicant determined that LNBYG was well-qualified to provide such services
12 to Applicant given LNBYG’s extensive experience in representing both chapter 11 debtors and
13 trustees, and, therefore, engaged LNBYG as bankruptcy counsel, subject to Court approval.
14 Accordingly, pursuant to the Application, Applicant seeks to employ LNBYG as his bankruptcy
15 counsel to render, among others, the following types of professional services:

16 a. advising Applicant with regard to the requirements of the Bankruptcy
17 Court, Bankruptcy Code, Bankruptcy Rules and the Office of the United States Trustee (“OUST”)
18 as they pertain to the Debtor;

19 b. advising Applicant with regard to certain rights and remedies of its
20 bankruptcy estate and the rights, claims and interests of creditors;

21 c. representing Applicant in any proceeding or hearing in the Bankruptcy
22 Court involving its estate unless Applicant is represented in such proceeding or hearing by other
23 special counsel;

24 d. conducting examinations of witnesses, claimants or adverse parties and
25 representing Applicant in any adversary proceeding except to the extent that any such adversary
26 proceeding is in an area outside of LNBYG’s expertise or which is beyond LNBYG’s staffing
27 capabilities;

e. preparing and assisting the Applicant in the preparation of reports, applications, pleadings and orders including, but not limited to objections to claims, settlements and other matters relating to the case;

f. investigating, evaluating, and prosecuting objections to claims as may be appropriate; and

g. performing any other services which may be appropriate in LNBYG's representation of Applicant during the bankruptcy case.

PLEASE TAKE FURTHER NOTICE that LNBYG is a firm which specialized in the practice of bankruptcy law and has represented chapter 7 and 11 trustees in many bankruptcy cases for numerous years.

PLEASE TAKE FURTHER NOTICE that to the best of Applicant's knowledge and based upon the Declaration of David B. Golubchik, LNBYG and all attorneys associated with LNBYG who expect to render services in this matter are disinterest persons, do not hold or represent an interest adverse to the estate, and do not have any connections with the Debtor, the creditors of the estate, any other party in interest in this case, or each of their respective attorneys or accountants, the OUST, or any person employed by the OUST except that LNBYG has represented the Trustee in unrelated cases before the United States Bankruptcy Court and that Todd A. Frealy is also a Chapter 7 Trustee on the panel of Trustees for the Riverside Division of the United States Bankruptcy Court, Central District of California, who has been represented by the Trustee's law firm (Roquemoire, Pringle & Moore, Inc.). However, such prior connections do not affect the proposed representation herein.

PLEASE TAKE FURTHER NOTICE that because LNBYG's practice is limited exclusively to matters of bankruptcy, insolvency and reorganization law, the services provided by LNBYG do not include the rendition of substantive legal advice outside of these areas such as corporate, tax, securities, tort, environmental, labor, criminal, real estate law or real estate litigation. LNBYG will not be required to represent or advise the Trustee in matters which LNBYG believes are beyond LNBYG's expertise such as the areas of law just described. In addition, LNBYG will not be required to represent the Trustee in matters where LNBYG

determines that it lacks the ability to staff the matter adequately, such as in certain, major complex litigation.

PLEASE TAKE FURTHER NOTICE that no compensation will be paid by the Trustee to LNBYG except upon application to and approval by this Court after notice and a hearing pursuant to sections 330 and 331 of the Bankruptcy Code. The hourly rates of attorneys and paraprofessionals of LNBYG are set forth on the schedule attached to the Application. LNBYG has not received any retainer for legal services in contemplation of and in connection with this case.

PLEASE TAKE FURTHER NOTICE that Local Bankruptcy Rule 2014-1(b)(3)(E) requires that any response and request for hearing, in the form required by Local Bankruptcy Rule 9013-1(f)(1), be filed and served on the Trustee, his counsel, and the OUST no later than 14 days from the date of service of this Notice, plus three (3) additional days if the notice was served by mail, or pursuant to F.R.Civ.P. rules 5(b)(2)(D) or (F).

PLEASE TAKE FURTHER NOTICE that the failure to file a timely objection to the Application or request for a Bankruptcy Court hearing on the Application may be deemed by the Bankruptcy Court to constitute consent to Bankruptcy Court approval of the Application.

DATED: April 11, 2024

LEVENE, NEALE, BENDER,
YOO & GOLUBCHIK L.L.P.

By: /s/ David B. Golubchik
DAVID B. GOLUBCHIK
Proposed Attorneys for John P. Pringle,
Chapter 11 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled: **Notice Of Filing Of Application Of Chapter 11 Trustee To Employ Levene, Neale, Bender, Yoo, And Golubchik L.L.P. As General Bankruptcy Counsel** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 11, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Alan W Forsley alan.forsley@flpllp.com, awf@fklawfirm.com, awf@fl-lawyers.net, addy@flpllp.com
- Todd A. Frealy taf@lnbyg.com
- Amir Gamliel amir-gamliel-9554@ecf.pacerpro.com, cmallahi@perkinscoie.com; DocketLA@perkinscoie.com
- David B Golubchik dbg@lnbyg.com, dbg@lnbyg.com
- Michael D Kwasigroch attorneyforlife@aol.com
- Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com, addy@flpllp.com
- Kelly L Morrison kelly.l.morrison@usdoj.gov
- John P Pringle (TR) brenfro@rpmlaw.com, jpp@trustesolutions.net; jpringle@rpmlaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On **April 11, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service list attached

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **April 11, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 11, 2024
Date

Rebecka Merritt
Type Name

/s/ Rebecka Merritt
Signature

Label Matrix for local noticing

0973-2

Case 2:24-bk-10874-VZ

Central District of California

Los Angeles

Thu Apr 11 14:07:06 PDT 2024

Los Angeles Division

255 East Temple Street,

Los Angeles, CA 90012-3332

Main Document

120 South Reeves Drive

Beverly Hills, CA 90212-3005

INTERNAL REVENUE SERVICE

P.O. BOX 7346

PHILADELPHIA, PA 19101-7346

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Perkins Coie LLP

Amir Gamliel

1888 Century Park East, Suite 1700

Los Angeles, CA 90067-1721

Navraj Singh & Paramjit Singh

19207 Dunure Place,

Porter Ranch, CA 91326-1015

PNC real estate

Midland Loan Services

PO Box 25965

Shawnee Mission, KS 66225-5965

United States Trustee (LA)

915 Wilshire Blvd, Suite 1850

Los Angeles, CA 90017-3560

Wells Fargo Bank, N.A., as Trustee

c/o Amir Gamliel

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1888 Century Park East, Suite 1700

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C/O attorney Perkins Coie LLP

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John P Pringle (TR)

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Michael D Kwasigroch

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Courtesy NEF

(u)Navraj Singh

(u)Paramjit Singh

End of Label Matrix

Mailable recipients 11

Bypassed recipients 3

Total 14